

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JOHN HILL, Individually and On Behalf of All  
Others Similarly Situated,

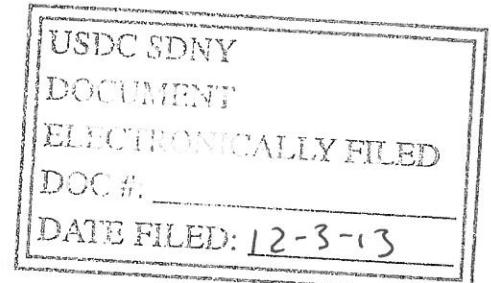
Plaintiff,

vs.

CHINA-BIOTICS, INC., SONG JINAN, LI CHI  
YUEN a/k/a RAYMOND LI, LEWIS FAN, YAN  
YIHONG a/k/a EVA YAN, and TRAVIS CAI,

Defendants.

Civil Action No. 10-CV-7838-PAC



**STIPULATION AND PROPOSED ORDER**

WHEREAS, on January 9, 2012, plaintiffs John Hill and Nureddin Nejim ("Plaintiffs") filed a Second Amended Complaint;

WHEREAS, on October 18, 2012, the Court consolidated the above-captioned case with *Casper v. Jinan*, 12-cv-4202 (S.D.N.Y.);

WHEREAS the parties participated in a second mediation session on July 17, 2013;

WHEREAS, on September 27, 2013, the Court "So Ordered" a stipulation, which required the Plaintiffs to file a consolidated amended complaint by December 1, 2013 if the case did not settle before then;

WHEREAS the parties have reached an agreement in principle to resolve the action and are in the process of preparing the appropriate documents necessary to finalize the settlement; and

WHEREAS, once the appropriate settlement documents are finalized and executed by the parties, the parties will move the Court for preliminary approval of the settlement.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties, that:

1. The above-referenced action is stayed in all regards pending the finalization of papers documenting the settlement and the filing of a motion for preliminary approval of the settlement.

Dated: November 29, 2013

**SAXENA WHITE P.A.**

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*Counsel for Plaintiffs*

**SO ORDERED:**

Dated: 12-3-13

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*Attorneys for Defendants China-Biotics, Inc.*



Honorable Paul A. Crotty  
United States District Judge

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